

Epure (28559)
Environmental and Social Action Plan (ESAP)

	Action	Deliverable	Due Date
Environmental and Social Management System			
1.	ESHS Position at Corporate Level Epure will either designate an individual within the organization or hire a new person with responsibility and authority for all environmental, social, health and safety (ESHS) and labor matters at the Company. The individual's role will be clearly defined, including a written job description, and sufficient management authority and resources will be provided to ensure compliance with relevant and applicable laws and regulations. The individual will ensure consistency with good international industry practice for ESHS performance and maintain compliance with all regulatory and IFC requirements (including during construction of wastewater treatment and associated facilities). (i) Create position and advertise with Terns of Reference; and (ii) Employed/In post	Documentary Evidence - Position creation - Reporting line - Hiring notice	(i) COD ¹ – First (ii) + 60 days
2.	Integrated Environmental and Social Management System (ESMS) Epure will integrate ESH&S management into its existing management system to provide continued oversight of ESH&S for all its operations and those of its subcontractors. The management system must ensure consistency with good international industry practice for ESHS performance and maintain compliance with all regulatory and IFC requirements. Specifically, the Management system must include (but not limited to): (i) Screening of business opportunities and service models against IFC Performance Standards (PS 1 through PS 8) and relevant EHS Guidelines. (ii) Oversight of construction activities – labor and OHS issues (iii) Procurement procedures to provide oversight and contractually require that its suppliers and subcontractors comply with national regulatory requirements and Epure's ESHS policies. (iv) Integrated OHS functions – training, monitoring, and reporting. (v) Procedures for communicating environmental and social aspects to external interested parties, including clear procedures for receiving, documenting and responding to concerns from any external interested parties related to the project.	Documentary Evidence - Operating Procedure and Policy - Procedures on Community Engagement	COD (First) +180 days

¹ Condition of Disbursement

	Action	Deliverable	Due Date
Labor and Working Conditions			
3.	Working and Living Conditions of Sub-Contracted Labor Review with external assistance EPure's HR policies, procedures and training program for consistency with good international industry practice – for construction and operational phases. Scope of review should also include worker accommodation and oversight of payment of wages/overtime for operations in China or elsewhere. Specific milestones are: (i) Retain Consultant (TOR to be developed in consultation with IFC) (ii) Completion of review by consultant and allocation of resources (iii) Implement recommendations from consultant review.	Documentary evidence (i) Copy of Contract (ii) Consultant Review and Recommendation (iii) Implementation plan with resource (management + fiscal) allocation	(i) COD – First (ii) + 60 days (iii) + 120 days
4.	Workplace Safety Review with external assistance EPure's OHS policies, procedures and training program for consistency with good international industry practice – for construction and operational phases. Scope of review should also include safety of equipment designed and/or manufactured by EPure for use in China or elsewhere. Specific milestones are: (i) Retain Consultant (TOR to be developed in consultation with IFC) (ii) Completion of review by consultant and allocation of resources (iii) Implement recommendations from consultant review.	Documentary evidence (i) Copy of Contract (ii) Consultant Review and Recommendation (iii) Implementation plan with resource (management + fiscal) allocation	(i) COD – First (ii) + 60 days (iii) + 120 days
Pollution Prevention and Abatement			
5.	Review and Quantification of Industrial Wastewater Sources EPure will review, identify and quantify industrial sources of wastewater at each of its operations and implement a comprehensive monitoring program for influent to and effluent from BOT facilities operated by EPure.	Documentary Evidence – Report of Industrial Discharges to EPure BOT projects.	COD (First) + 180 days
Community Health, Safety and Security			
6.	Update Emergency Response Procedures EPure will review and update its procedures, training and infrastructure to ensure safe operations and emergency response associated with transportation, storage and handling of hazardous chemicals. Updated procedures must include a community involvement component that addresses communication of risk, appropriate behavior, and safety measures to be implemented in the event of release of chlorine gas. Specific milestones are: (i) Retain Consultant; (ii) Completion of review by consultant and allocation of resources; and (iii) Implement recommendations from consultant review.	Documentary evidence (i) Copy of Contract (ii) Consultant Review and Recommendation (iii) Implementation plan with resource (management + fiscal) allocation	(i) COD – First (ii) + 60 days (iii) + 90 days